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May 29, 2025

Honorable Valerie Figueredo, U.S.M.J.
Daniel Patrick Moynihan Courthouse
500 Pearl St., Courtroom 17A
New York, NY 10007

Re: Diaz v. Ker Geotech et al. 1:25-cv-01450

Dear Judge Figueredo:

This office represents the Plaintiff in the above-referenced matter. As per this Court's order, the parties write jointly to inform this Court of the disputes that the parties have with regards to the case management plan. In sum, Plaintiff is requesting four months for discovery to be completed, while Defendants are requesting five months. Moreover, while Plaintiff does not anticipate the need for any expert discovery, Defendants' position is that they have not yet determined if experts will be necessary.

We thank the Court for its time and attention to this matter.

Respectfully Submitted,

/s/ Robert Jun
Robert Jun
Michael Faillace & Associates, P.C.
Attorneys for Plaintiff